

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION**

PATRICIA A. JOHNSON,

Plaintiff,

v.

WELLS FARGO BANK, N.A.,
EQUIFAX INFORMATION
SERVICES, LLC, and TRANSUNION,
LLC,

Defendant.

Case No. 1:22-cv-00513-BMB

Judge Bridget Meehan Brennan

REPORT OF PARTIES' PLANNING MEETING

Pursuant to this Court's May 26, 2022 Order [Dkt. 16], Patricia A. Johnson ("Plaintiff") and Wells Fargo Bank, N.A. ("Defendant") (collectively the "parties") jointly submit this status report:

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b), a meeting was held on and was attended by:

Counsel for Plaintiff(s): Marwan R. Daher

Counsel for Defendant(s): Nicholas D. O'Conner

2. The parties:

_____ Have exchanged the pre-discovery disclosures required by Rule 26(a)(1) and the Court's CMC Notice; or

___X___ Will exchange such disclosures by July 8, 2022.

3. The parties recommend the following track:

___ Expedited **X** **Standard** ___ Complex ___ Administrative ___ Mass Tort

4. **This case is** for Alternative Dispute Resolution (“ADR”)

(e.g., **mediation**, arbitration, summary trial).

5. The parties **do not consent** to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. 636(c).

6. The parties agree that this case **does** involve electronic discovery. (**Counsel are reminded to review the default standard for e-discovery set forth in Appendix K to the Local Rules.**)

7. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought, the nature and extent of discovery and any potential problems:

Discovery will focus on Defendant’s alleged erroneous reporting of the subject debt with a 30-day late notation on June 2018 and a 60-day late notation on July 2018 on Plaintiff’s Equifax and Transunion credit file. Plaintiff alleges that Defendant unlawfully violated 15 U.S.C. §1681s-2(b)(1)(A) and 15 U.S.C. §1681s-2(b)(1)(B) by failing to conduct an investigation or review, with respect to the disputed information after receiving requests for an investigation from Experian, TransUnion, Equifax, and Plaintiff. Furthermore, Plaintiff alleges Defendant violated 15 U.S.C. §1681s-2(b)(1)(C)-(E) when it failed to report the results of the investigation or reinvestigation to Experian, Equifax, and TransUnion and modify, delete, or permanently block the inaccurate and misleading information from appearing and reappearing on Plaintiff’s credit files. Defendant Midland denies Plaintiff’s allegations.

(b) Describe anticipated e-discovery issues (i.e., what ESI is available and where it resides; ease/difficulty and cost of producing information; schedule and format of

production; preservation of information; agreements about privilege or work-production protection, etc.):

___ The parties certify that have discussed ESI and have agreed to produce all ESI in .pdf format.

Anticipated e-discovery issues including but not limited to; written communications between Defendant's, Plaintiff's disputes, Credit reports, and Defendant's account notes.

8. Recommended cut-off for amending the pleadings and/or adding additional parties: July 14, 2022

9. Expert reports disclosed by:

(a) Plaintiff(s): 10/7/2022

(b) Defendant(s): 10/21/2022

10. Discovery deadlines: 11/21/2022

11. Recommended dispositive motion date: January 31, 2023

12. Recommended date for telephone status: As is.

13. Other matters for the attention of the Court: None.

Dated: June 24, 2022

Respectfully submitted,

/s/ Marwan R. Daher

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